

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

John Abboud, individually and as legal guardian of Nahida Abboud :
Plaintiff, : Case No. _____
v. : Judge _____
Liberty Mutual Group Inc. and Liberty Mutual Insurance Company, :
Defendants. :

**DEFENDANTS LIBERTY MUTUAL GROUP INC. AND LIBERTY MUTUAL
INSURANCE COMPANY'S NOTICE OF REMOVAL**

Now come defendants Liberty Mutual Group Inc. and Liberty Mutual Insurance Company ("Defendants"), by and through counsel, and for their Notice of Removal of this action from the Common Pleas Court of Summit County, Ohio to the United States District Court, Northern District of Ohio, Eastern Division, state:

1. Plaintiff John Abboud filed suit in the Common Pleas Court of Summit County, Ohio in Case No. CV-2015-10-4856 on or about October 15, 2015. Plaintiff's Complaint alleges causes of action against Defendants for Breach of Contract, Negligent/Intentional Misrepresentation, Negligence/Breach of Fiduciary Duty, and Negligent hiring/training/supervision/retention.
2. Defendants were served with Plaintiff's Complaint not more than 30 days ago.
3. This Court has original jurisdiction over this type of action pursuant to 28 U.S.C. § 1332(a)(1), and Defendants may therefore remove this action to this Court pursuant to 28 U.S.C. § 1441(a), for:

- a. Complete diversity of citizenship exists between Plaintiff, who resides Ohio; and Defendants who are incorporated in and maintain a principal place of business in a state other than Ohio; and
 - b. Defendants believe the judgment if Plaintiff were to prevail on the merits of the case as presented in the Complaint could exceed \$75,000, exclusive of costs and interest, given that Plaintiff's Complaint seeks \$2 million in underinsured motorist coverage under the Umbrella Policy; compensatory damages in addition to the amount owed under the Policy in excess of Twenty-Five Thousand Dollars; punitive damages in excess of Twenty-Five Thousand Dollars; and costs, attorney fees, pre and post-judgment interest, and such further relief to which Plaintiff may be entitled.
4. As required by 28 U.S.C. § 1446(b), Defendants are filing this Notice of Removal within thirty days of Defendants being served with Plaintiff's Complaint.
5. This action has been pending less than a year.
6. As required by 28 U.S.C. § 1446(a), Defendants are attaching in an Appendix hereto a copy of each process, pleading and order, they have received.
7. No parties other than these Defendants are named in the Complaint, so no other parties need to consent to the removal of this action.

Respectfully submitted,

/s/ William M. Harter

William M. Harter (0072874)

Frost Brown Todd LLC

10 W. Broad Street, Suite 2300

Columbus, Ohio 43215

(614) 464-1211 / (Fax) (614) 464-1737

wharter@fbtlaw.com

*Attorney for Defendants Liberty Mutual Group Inc.
and Liberty Mutual Insurance Company*

CERTIFICATE OF SERVICE

A true and accurate copy of the foregoing has been served on all parties via their counsel of record through the Court's ECF system this 16th day of November, 2015. For any counsel not registered to receive filings electronically, a copy of the foregoing will be sent via regular U.S. Mail, postage pre-paid.

/s/ William M. Harter

William M. Harter (0072874)
FROST BROWN TODD, LLC